



October 23, 2019

Ms. Nicole Bealle, Regional Director  
Texas Commission on Environmental Quality  
Houston Regional Office (Region 12)  
5425 Polk St, Ste H  
Houston TX 77023-1452

**SUBJECT: Annual Monitoring Report under 40 CFR 60, Subpart OOOOa  
Gulf South Pipeline Company, LP  
Brazos Compressor Station  
Regulated Entity Number RN108444332  
Permit-by-Rule Registration Number 133251**

Dear Ms. Bealle:

Gulf South Pipeline Company, LP (Gulf South) is submitting this annual report for its Brazos Compressor Station, located in Fort Bend County, as required by 40 CFR 60.5420a(b). The address for the facility is 3150 36th Division Memorial Highway, Rosenberg, TX 77471. The facility is located at 29.582814° North, 95.863224° West. To reach the site, take Highway 36 west from Rosenberg, TX for roughly 2.9 miles, then turn right onto an access road just before reaching the Frito-Lay (Houston) plant. Cross the railroad tracks on the access road and the site will be located roughly 0.7 miles ahead on the left.

This compressor station was initially placed into service on August 13, 2018, which constitutes the beginning of the initial compliance period under Subpart OOOOa pursuant to 40 CFR 60.5410a. This report covers the initial compliance period, which is from August 13, 2018 through August 12, 2019. Pursuant to 60.5420a(b), the report is due within 90 days after the end of the initial compliance period, making the due date November 10, 2019. This submittal is therefore timely.

Construction of this station commenced after September 18, 2015; therefore, the collection of fugitive emission components at the station are considered an affected facility pursuant to 40 CFR 60.5365a(j). As such, the site is subject to the leak detection and repair (LDAR) provisions found in 40 CFR 60.5397a. The affected facility covered by this report is the collection of fugitive emission components at the compressor station. There are no other affected facilities under Subpart OOOOa in operation at the site.

Pursuant to 40 CFR 60.5397a(f)(2), the initial LDAR survey for this facility was due by October 12, 2018. As shown in the attached records, the initial LDAR survey was conducted on August 21, 2018 and subsequent quarterly surveys have been completed as required. Each quarterly survey was separated by at least 60 days pursuant to 60.5397a(g)(2).

The reporting requirements of 40 CFR 60.5420a(b)(7) are all met with this submittal (including attachments). Tables 1 and 2 provide many of the details in conjunction with the information provided in this letter. There are no components at this facility classified as difficult-to-monitor or unsafe-to-monitor; therefore, no monitoring of such components occurred during the reporting period. This statement satisfies 60.5420a(b)(7)(ix).

As reflected in attached Table 2, all of the leaks detected during the reporting period were repaired in accordance within the timeframes outlined in 40 CFR 60.5397a(h). One of the leaks did not require depressurization for repair and the repair of this leak was completed on the date of discovery in

**Gulf South Pipeline Company, LP**

9 Greenway Plaza, Ste. 2800 Houston, TX 77046 Tel. 713.479.8000 [www.gulfsouthpl.com](http://www.gulfsouthpl.com)



accordance with 60.5397a(h)(1). The remaining four leaks detected during the reporting period required depressurization of a section of tubing or piping in order to safely complete the repair. Each of these repairs were completed in accordance with 40 CFR 60.5397a(h)(2). Details are provided in Table 2.

Our intent was to file this annual report in US EPA's CEDRI system pursuant to 40 CFR 60.5420a(b)(11). However, according to information posted on the CEDRI site and conversations with US EPA personnel, the CEDRI template is not final at this time and the reporting portal for Subpart OOOOa is therefore not open. The portal likely will not reopen until the current rule reconsideration process has been completed. US EPA instructed us to file the report as we would other compliance reports until such time as the CEDRI template is finalized and the reporting portal is opened.

Gulf South is committed to maintaining its operations in compliance with all state and federal regulations. To the best of our knowledge, there have been no deviations from the requirements of 40 CFR 60, Subpart OOOOa at this facility during the reporting period. Please contact me at david.nickel@bwpmlp.com or (903) 753-7209 (extension 2926) if you have questions or need additional information.

Sincerely,

A handwritten signature in black ink that reads "David Nickel".

David Nickel  
Environmental Specialist

Attachments

cc: TCEQ Central Office  
US EPA, Region VI (Submitted electronically to [R6WellCompletion@epa.gov](mailto:R6WellCompletion@epa.gov))  
Brazos Compressor Station (Air Files)

**Table 1**  
**Summary of LDAR Monitoring Surveys**

Company Name: Gulf South Pipeline Company, LP

Facility Name: Brazos Station

Reporting Period: August 13, 2018 through August 12, 2019

Reporting Requirement Citation; 40 CFR 60.5420a(b)(7)

(i)	(ii)	(ii)	(iii)	(iii)	(iv)	(iv)	(iv)	(v)	(vi)
Survey Date	Beginning Time	Ending Time	Name of Camera Operator	Training and Experience	Ambient Temperature (F)	Sky Conditions	Max Wind Speed (mph)	Monitoring Instrument Used	Any Deviations from Monitoring Plan? If so, describe
8/21/2018	12:00 PM	1:00 PM	Steve Tiemann	Trained thermographer with 12 years of experience operating OGI camera	90	Sunny	3	FLIR Model 320 Optical Gas Imaging Camera	No
12/11/2018	10:40 AM	11:40 AM	Steve Tiemann	Trained thermographer with 12 years of experience operating OGI camera	58	Sunny	3	FLIR Model 320 Optical Gas Imaging Camera	No
2/12/2019	10:45 AM	11:30 AM	Bud McCorkle	Trained thermographer with 13 years of experience operating OGI camera	56	Partly Cloudy	15	FLIR Model 320 Optical Gas Imaging Camera	No
5/8/2019	11:00 AM	12:00 PM	CR Thompson	Trained thermographer with 8 years of experience operating OGI camera	80	Mostly Cloudy	4	FLIR Model 320 Optical Gas Imaging Camera	No

**Table 2**  
**Summary of Leak and Repair Data**

Company Name: Gulf South Pipeline Company, LP

Facility Name: Brazos Station

Reporting Period: August 13, 2018 through August 12, 2019

Reporting Requirement Citation: 40 CFR 60.5420a(b)(7)

	(vii)	(x)	(viii)	(xi)	(xi)	(xii)	
Leak #	Date Discovered	Component Type	Successful Repair Date	Repaired As Required in 60.5397a(h)?	Was Delay of Repair Necessary?	Explanation for Delay of Repair (if necessary)	Repair Verification Method
1	8/21/2018	Connector	8/21/2018	Yes	No	-	OGI
2	8/21/2018	Connector	12/5/2018	Yes	Yes	There was pressure on both sides of the tubing leak, had to depressurize to repair.	Soap Bubbles
3	8/21/2018	Connector	12/5/2018	Yes	Yes	There was pressure on both sides of the tubing leak, had to depressurize to repair.	Soap Bubbles
4	12/11/2018	Connector	1/14/2019	Yes	Yes	There was pressure on both sides of the tubing leak, had to depressurize to repair.	Soap Bubbles
5	12/11/2018	Valve	1/22/2019	Yes	Yes	There was pressure on both sides of the valve and the piping run must be depressurized in order to safely repair the valve.	Soap Bubbles
1Q19 survey conducted on 2/12/19. No leaks were found.							
2Q19 survey conducted on 5/8/19. No leaks were found.							

	(vii)	(vii)	(viii)	(xi)	(xi)
Survey Date	Component Type	Leaking Components Detected	Not Repaired As Required in 60.5397a(h)	Placed on Delay of Repair	Explanation for Delay of Repair (if necessary)
8/21/2018	Connector	3	0	2	See above
12/11/2018	Connector	1	0	1	See above
12/11/2018	Valve	1	0	1	See above

Note: There were no components on delay of repair at the end of the reporting period.

## 40 CFR 60, Subpart OOOOa Annual Report Certification Statement

*I, the undersigned, qualify as a certifying official pursuant to 40 CFR 60.5430a and hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document and its attachments are true, accurate and complete.*

A handwritten signature in blue ink, reading "Dave Perkins", is written over a horizontal line.

Dave Perkins

Vice President – Environmental, Safety, and Security

Date: October 23, 2019